

CAMILLE M. ABATE, ESQ.
ATTORNEY AT LAW

Of Counsel, Nicholas Goodman & Associates
333 Park Avenue South, Suite 3A, New York, NY 10010
TEL: (212) 227-9003 • FAX: (212) 937-2112
c.abate71@gmail.com

April 25, 2024

VIA ECF

Hon. John G. Koetl
United States District Judge
Patrick M. Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

RESPONSE TO VERGON-ESDAY,
JUNE 26, 2024, AT 4:30PM

SO ORDERED.

4/25/24 *[Signature]* ✓ S D J

Re: Request for Continuance of Sentencing Date
United States v. Luis Cerna-Marroquin, 23 Cr. 360 (JGK)

Dear Judge Koetl:

Sentencing in the instant matter is currently scheduled for June 11, 2024 at 4:30 p.m. I write to request that the sentencing be continued for a period of two weeks until June 25, 2024 or June 26, 2024.

The reason for this request is that the presentence interview has not yet been conducted because I was unavailable from mid-March through April 19, 2024, due to a trial in Nassau County Court commencing with jury selection on April 2 through verdict on April 18, 2024. Probation Officer Jemmard Thomas and I are now in the process of scheduling the interview, which we anticipate will take place sometime next week.

Currently the first draft of the Presentence Report (PSR) is due May 3, with the final PSR due on May 31, 2024. Given that Mr. Cerna-Marroquin has not yet been interviewed, we respectfully request that the first disclosure date be amended to May 20, with the final disclosure due June 14. I have spoken to AUSA Andrew Jones about this request, and the government consents to the extension.

Thank you for your consideration of this matter.

Sincerely,

Camille M. Abate

Camille M. Abate, Esq.

cc: AUSA Andrew Jones and AUSA Ashley Nicholas (via ECF)